

Exhibit A

AND THE COMMUNITY PROPERTY *
OR CONJUGAL PARTNERSHIP *
CONSTITUTED BETWEEN JOE DOE *
AND DOCTOR ILEANA TORRES; *
DOCTOR ERNESTO TORRES ARROYO *
IN HIS PERSONAL CAPACITY, *
OLGA I. MENDEZ FLORES IN *
HER PERSONAL CAPACITY, *
AND THE CONJUGAL PARTNERSHIP *
OR COMMUNITY PROPERTY *
CONSTITUTED BETWEEN DOCTOR *
ERNESTO TORRES ARROYO AND *
OLGA I. MENDEZ FLORES; *
X, Y and Z INSURANCES *
COMPANIES; DOCTOR ELLIOT *
MELECIO VEGA, CLARK DOE, *
AND JAKE DOE *
*
DEFENDANTS *
*
* * * * *

PLAINTIFFS' FIRST REQUEST FOR PRODUCTION AND COPY OF

DOCUMENTS

TO: ZOE LABOY IN HER PERSONAL CAPACITY; MR. SIXTO MARRERO IN
HIS PERSONAL CAPACITY; MR. EMILIO CASTILLO IN HIS PERSONAL
CAPACITY, MERCEDES ROSADO IN HER PERSONAL CAPACITY AND THE
COMMUNITY PROPERTY OR CONJUGAL PARTNERSHIP CONSTITUTED
BETWEEN EMILIO CASTILLO AND MERCEDES ROSADO; BY THEIR LEGAL
REPRESENTATION, LIZZIE M. PORTELA, ESQ.

FROM: PLAINTIFFS THROUGH ATTORNEY OF
RECORD GLENN CARL JAMES

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, the Plaintiffs hereby requests that the CO-defendant produce and/or permit Plaintiffs to inspect for copying the following documents. Co-defendant shall produce and allow to be copy the documents, on March 28, 1998, at 4:00 P.M. at James Law Offices, La Torre de Plaza, 525 F.D. Roosevelt Ave., San Juan, P.R. 000918.

INSTRUCTIONS

If you argue that any information or document is privileged, explain in detail each and every fact or ground upon which the privilege is based, including the facts in which you based yourself in order to determine if it is privilege or not. If you state that any document is privilege, answer the following questions:

1. What is or are the name (s) of the author (s) of the document (s) that you argue to be privilege?;
2. What is or are the name (s) of the person or people to whom, the document (s) was or were addressed?;
3. What is or are the name (s) of the person or people to whom the documents (s) indicate (s) was or were to be carbon copied?;
4. What is the day, month, and year of the document?;

5. What is the nature of the claimed privilege or immunity?

If the Co-defendant does not produce the documents requested by the Plaintiffs, it will force us to file a motion in the Federal Court so that you will comply with the production of the document (s).

DEFINITIONS

A. "You" and "your" for the purposes of this discovery procedure mean Co-defendants or anyone acting in their behalf.

B. Document or documents shall mean any typed, written, recorded or graphic matter, of any kind or description, in their case sent or received. It should include the originals, non-identical copies, drafts and both sides of any document in which the information appears on both sides of any document in which the information stored in, or accessible in the computer or any of their retrieval systems, it should include any instructions and all other material necessary to interpret those compilations of data and information.

The expressions of document or documents do include, but are not limited to: minutes, notes, telegrams, letters, books, papers, interviews, conferences, meetings, affidavits, statements, agendas, reports, telephone's recordings, interviews, summaries,

reports, studies, analysis, agreements, journals, diaries, lists, tabulations, opinions, studies, evaluations, contracts, computer, print-outs, data processing inputs/outputs, microfilms, records kept by mechanical electronic and photographic means, and other things that could be similar to any of the above mentioned in this paragraph.

C. Person shall mean any governmental body, governmental instrumentality, public corporation, natural person, individual firm, corporation, association, limited liability partnership, partnership, professional corporation, proprietorship, organization, joint venture, any type of business, enterprise or other entity.

REQUEST NUMBER ONE (1)

Produce all documents related to the instant case of wit.

REQUEST NUMBER TWO (2)

Produce all documents that you intend to use at the trial as evidence, even for impeachment purposes.

REQUEST NUMBER THREE(3)

Produce all documents related to the medical evaluations related to Mr. Orlando Ocasio Alsina from doctor Amaury Hernández that he allege he evaluated on November 12, 17 and 18, 1997; from doctor Margarita Bruno that she allege she evaluated on November 21, 1997; from doctor Ely Declet that he allege he evaluated on November 30, 1997; from doctor José Maysonet that he allege that he evaluated on December 15, 1997; from doctor Manuel Zavala that he allege he evaluated on December 16, 1997; from doctor Clementina Devarie that she allege she evaluated on December 30, 1997; from doctor Pedro Pérez Ariudel that he allege he evaluated on December 31, 1997; from doctor Manuel Zavala Rivera that he allege he evaluated on December 31, 1997; from the doctors at the Medical Center that evaluated Mr. Orlando Ocasio Alsina between January 2 to 16, 1998; from Dr. Angel Avilés that he allege he evaluated Mr. Orlando Ocasio Alsina on January 16 and 17, 1998; from Dr. Elliot Melecio Vega that he allege that evaluated Mr. Orlando Ocasio Alsina on January 19, 21, 23, 26, 27, 28, 29 and 30, 1998; from Dr. Elliot Melecio that he allege that he evaluated Mr. Orlando Ocasio Alsina on February 2, 3, 4, 5, 6, 9, 11, 12,

13, 16, 17, and 18, 1998; from Dr. Elliot Melecio that he allege that he evaluated Mr. Orlando Ocasio Alsina on May 11, 1998; from Ms. Marisa García, Social Worker that she allege that she evaluated Mr. Orlando Ocasio Alsina on January 19 and 22, 1997; and Dr. Jorge Jiménez that he allege he evaluated Mr. Orlando Ocasio Alsina on May 11, 1998.

REQUEST NUMBER FOUR(4)

Produce all documents that evidence the curriculum vitae and/or qualifications from Dr. Elliot Melecio Vega (he allege he visited Mr. Orlando Ocasio Alsina on January 19, 21, 23, 26, 27, 28, 29, and 30, 1998, he also allege he visited Mr. Orlando Ocasio Alsina on February 2, 3, 4, 5, 6, 9, 11, 12, 13, 16, 17, and 18, 1998, furthermore he allege he visited Mr. Orlando Ocasio Alsina on May, 1998); from Dr. Ernesto Torres, Director of the Medical Services from the Correctional Complex of Bayamón; doctora Ileana Torres Assistant of the Executive Director from the Central Offices of the Health Correctional Program ("Chief Health Coordinator") and from Ms. Aida Guzmán, Executive Director from the Central Offices of the Health Correctional Service Program.

REQUEST NUMBER FIVE(5)

Produce the CT Scan and the written results perform to Mr. Orlando Ocasio Alsina on November 12 and 14, 1997.

REQUEST NUMBER SIX(6)

Produce the medical records which evidence the services provided to Mr. Orlando Ocasio Alsina during November, 1997 until May 11, 1998 at the Medical Center, Correctional Administration, Health Department, and the Health Correctional Service Program.

REQUEST NUMBER SEVEN(7)

Produce all records prepared by Dra. Aida Guzmán Font as Chief Health Care Coordinator name by the Federal District Court of Puerto Rico related to the Morales Feliciano, during the last seven years.

REQUEST NUMBER EIGHT(8)

Produce X rays, CT SCANS, MRI and their results, which are related to Mr. Orlando Ocasio Alsina, perform to him at the Medical Center of Río Piedras, Correctional Administration, Health Department, Health Correctional Service Program and at any hospital in Bayamón, Puerto Rico, from November, 1997 until May, 1998.

REQUEST NUMBER NINE(9)

Produce all documents which evidence the neurological treatment received by Mr. Orlando Ocasio Alsina between November, 1997 until May, 1998, within the Commonwealth of Puerto Rico, including the Medical Center at Río Piedras, the Correctional system, the Health Department, and the Health Correctional Service Program.

REQUEST NUMBER TEN(10)

Produce all documents related to the residential addresses, family members addresses, and telephone numbers from Mr. Felix A. Ramos Moulrier, Nathaniel Mojica Reyes, Javier Del Valle Llopiz, Gilberto Rivera Rodríguez, Ericka Diaz Davila, Luis López Negrón, Carmelo Román Hernández, Wilson García Cueva, Edwin Riveras, Edwin Meléndez Meléndez y Javier Rodríguez Torred who were approximately during November, 1997 at the annex 1072, annex 292 and at maxim II at the Regional Prison of Bayamón at the Correctional Administration.

REQUEST NUMBER ELEVENTH(11)

Produce all documents that evidence at which institution, jail, and/or prison would be right now Mr. Felix A. Ramos Moulrier, Nathaniel Mojica Reyes, Javier Del Valle Llopiz, Gilberto Rivera Rodríguez, Ericka Diaz Davila, Luis López Negrón, Carmelo Román Hernández, Wilson García Cueva, Edwin Riveras, Edwin Meléndez Meléndez y Javier Rodríguez Torred, if they still are within the Correctional system.

REQUEST NUMBER TWELVE(12)

Produce all the medical record(s) from Mr. Orlando Ocasio Alsina from October 31, 1997 until May, 1998, prepared by the Health Department, Health Correctional Service Program.

REQUEST NUMBER THIRTEEN(13)

Produce all the reports prepared by the Correctional Administration regarding the riot on November 8 and/or 9, 1997, at the Regional Prison of Bayamón.

REQUEST NUMBER FOURTEEN(14)

Produce all documents forward to Mr. Sixto Marrero, Superintendent of the Regional Prison at Bayamón, directly or indirectly related to Mr. Orlando Ocasio Alsina, that were prepared during the last four years.

REQUEST NUMBER FIFTEEN (15)

Produce all documents which state the names, residential addresses, and telephone numbers of all the secretaries from Mr. Sixto Marrero, Superintendent of the Regional Prison at Bayamón, from November to December, 1997.

REQUEST NUMBER SIXTEEN (16)

Produce all documents forward to Ms. Zoe Laboy regarding the riot on November 8 or 9, 1997 at the Bayamón Regional Prison.

REQUEST NUMBER SEVENTEEN (17)

Produce all reports between 1994 until May, 1998 that make reference to the need of doctors, medical equipment, and any other

medical services within the Correctional Administration, and the Health Department, Health Correctional Service Program.

REQUEST NUMBER EIGHTEEN(18)

Produce all documents between 1992 until May, 1998, that make reference to the need within the Correctional Administration and the Health Department, Health Correctional Service Program, of the need of ambulance(s), correctional officers, and/or vehicles of medical transportation or vehicles in order to transport prison mates that need medical assistance.

REQUEST NUMBER NINETEEN(19)

Produce all reports between 1992 until 1998, which made reference to the need of medicines and medical equipment within the Correctional Administration and the Health Department, Health Correctional Service Program.

REQUEST NUMBER TWENTY(20)

Produce all documents between 1994 until 1998, which made reference of the need or lack of doctors with the specialization of a neurologist, infectologist and/or neurosurgeon within the Correctional Administration and the Health Department, Health Correctional Service Program.

REQUEST NUMBER TWENTY-ONE(21)

Produce all documents between 1994 until 1999, that make reference of the need of medical doctors, nurses and/or medical employees within the Correctional Administration and the Health Department, Health Correctional Service Program.

REQUEST NUMBER TWENTY-TWO (22)

Produce all documents prepared by the Correctional Administration, Health Department, Health Correctional Service

Program, state agencies, federal courts, state courts and/or federal agencies, which made reference to a Medical Plan and/or a Mental Health Plan (directly and/or indirectly related to request numbers seven and/or twenty four), and/or which contains information of the plans regarding the progress, compliance, noncompliance, and reevaluation.

REQUEST NUMBER TWENTY-THREE(23)

Produce all the records from the Correctional Administration regarding Mr. Orlando Ocasio Alsina from 1997 until 1998.

REQUEST NUMBER TWENTY-FOUR(24)

Produce the "Medical Care Plan" approved by the Federal District Court for the District of Puerto Rico of October 23, 1990 as a result of the "Amended 62nd Report of the Court Monitor Recommending Adoption of the revised Medical and Mental Health Plans."

REQUEST NUMBER TWENTY-FIVE(25)

Produce all documents prepared and/or subscribed by the Director of the Medical Clinic at the Correctional Complex in Bayamón, Ernesto Torres Arroyo, related to the medical necessities, such as the medical personnel and equipment, within the Correctional Complex at Bayamón during the time that he served as director in Bayamón.

REQUEST NUMBER TWENTY-SIX(26)

Produce a copy of the curriculum vitae of each expert witness that you will use and their expert reports.

REQUEST NUMBER TWENTY-SEVEN(27)

Produce all documents prepared and/or subscribed by Zoe Laboy, Superintendent Sixto Marrero, doctor Aida Guzmán, lieutenant Emilio Castillo, Dr. Ernesto Torres Arroyo, doctor Ileana Torres Arroyo, and Dr. Elliot Melecio Vega related to Mr. Orlando Ocasio Alsina from November, 1997 until this date.

REQUEST NUMBER TWENTY-EIGHT(28)

Produce all documents prepared and/or subscribed or received from other persons by Ms. Zoe Laboy, the superintendent Sixto Marrero, doctor Aida Guzmán, Mr. Emilio Castillo, Dr. Ernesto Torres Arroyo, la Dra. Ileana Torres Arroyo, and Dr. Elliot Melecio Vega related to the necessities of medical personnel, medical equipment and/or vehicles within the Correctional Administration and/or the Health Department, Health Correctional Service Program during the last seven years.

REQUEST NUMBER TWENTY-NINE(29)

Produce a copy of any insurance policy that would cover the facts stated within the last amended complaint and/or any medical malpractice policy that would cover doctor Ernesto Torres Arroyo, doctor Elliot Melecio, doctor Aida Guzmán and doctor Ileana Torres during 1997 and 1998.

REQUEST NUMBER THIRTY(30)

Produce a copy of the Medical Plan and Mental Health Plan which is within the Central Offices at Health Correctional Service Program and/or within the Directors' offices at correctional institutions which is related to the Morales Feliciano's case.

I HEREBY CERTIFY: That a true and exact copy of this document has been sent by certified mail with return receipt to: Leticia Ramirez Rangel, Esq., Federal Litigation Division, Department of Justice, P.O. Box 9020192, San Juan, P.R. 00902-0192 and Lizzie M. Portela, Esq., P.O. Box 13667, San Juan, P.R. 00908-3667.

In San Juan, Puerto Rico, this 22 day of February 2000.

JAMES LAW OFFICES
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